

# EXHIBIT A

Gurdip Singh Randhawa 30(b)(6)  
March 27, 2017

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - - X

EDMUNDO CALTENCO,

Plaintiff,

-against-

Case No.  
1:16-cv-01705

G.H. FOOD INC. d/b/a NATURAL GARDEN,  
and GURDIP SINGH, an individual,

Defendants.

- - - - - X

1010 Northern Boulevard  
Great Neck, New York

March 27th, 2017  
10:28 a.m.

EXAMINATION BEFORE TRIAL of GURDIP SINGH  
RANDHAWA, s/h/a GURDIP SINGH, the Defendant  
herein, taken by Plaintiff, pursuant to 30(b)(6)  
Notice, held at the above place and time, before  
Krystin Demand-Dattolo, Stenotype Reporter and  
Notary Public within and for the State of New  
York.

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1 G U R D I P S I N G H R A N D H A W A ,  
2 after having been duly sworn by a Notary  
3 Public of the State of New York, was  
4 examined and testified as follows:

5 THE REPORTER: Please state your name for  
6 the record.

7 THE WITNESS: Gurdip Singh Randhawa.

8 THE REPORTER: What is your current  
9 address?

10 THE WITNESS: 10 Helen Drive, Roslyn  
11 Heights, New York 11577.

12 EXAMINATION BY

13 MS. MCNAUGHTON:

14 Q. Good morning, Mr. Singh.

15 A. Good morning.

16 Q. My name is Caitlin McNaughton. I represent  
17 the plaintiff, and I'm going to be taking your  
18 deposition today.

19 So essentially how this works is I'm going to  
20 ask you some questions. You're going to respond to  
21 them if you know the answer. If at any point you  
22 don't understand what I'm asking you, please tell  
23 me, and I will do my very best to clarify or  
24 rephrase the question.

25 If at any point you need to take a break, I

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1 G. SINGH RANDHAWA

2 Q. So when you're ready, I'm going to ask you  
3 some questions, but I just want you to review the  
4 document.

5 A. Yes.

6 Q. Have you ever seen this document before?

7 A. No.

8 Q. Okay.

9 MS. MCNAUGHTON: That's all my questions.

10 MR. LABUDA: Okay.

11 On that one, or we're all done?

12 MS. MCNAUGHTON: Done.

13 MR. LABUDA: Okay.

14 MS. MCNAUGHTON: No further questions.

15 (TIME NOTED: 12:29 p.m.)

16

17

18 GURDIP SINGH RANDHAWA

19

20 Subscribed and sworn to before me

21 this day of , 2017.

22

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24

25 Notary Public